

Dear FCC-I support the Commission's actions to help low power stations threatened with encroachment. LPFMs should have maximum flexibility to find new channels. A full power station should not be allowed to make a move that will displace an LPFM if there is no place else for the LPFM to go or the LPFM can only go to an inferior channel. LPFMs should not be "secondary" to full power stations in the first place, but these new protections are the least the FCC can do.

As a founder of an LPFM, WXCS-LP 92.9FM Cambridge Springs, PA, I know first hand the issue of encroachment. We are situated about 20 miles south of Erie, PA and about 100 miles from Buffalo, Pittsburgh and Cleveland, respectively. What I see as the biggest threat of encroachment for WXCS comes from both stations from Buffalo and Pittsburgh of which both already step on our signal from 100 miles away. The seemingly innocent allocation of translators for either of these stations could terminally silence our feeble station of a mere 100 watts. On another issue, I wish we would be permitted the original 1000 watts that you were proposing for LPFMs in the "early days". But, the issue at hand is that both stations from Pittsburgh and Buffalo are already encroaching on our listening area. If the Pittsburgh station were to get a translator north of their current location and if Buffalo were to get a translator southwest of their current broadcast facility, we would almost certainly get crushed into oblivion. It is my hope that you, as FCC commissioners, at least have an awareness of how difficult it is for a station of 100 watts to be heard amongst the mega-watt stations. And if these big, corporate stations are granted additional translators in what might seem to be an "innocent enough" scenario, it can impact and destroy community-based stations, such as WXCS-LP through oversight of the fact that stations 100 miles or more away are already encroaching on LPFMs. Thank you for your consideration in this matter.

Sam Reese

President, Cambridge Community Radio Association